



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

July 27, 2009

Lesley Leonard  
Code EV22LL USWTR OEIS/EIS PM  
Naval Facilities Engineering Command  
Atlantic Division  
6506 Hampton Boulevard  
Norfolk, Virginia 23508-1278

SUBJECT: Final Environmental Impact Statement/Overseas Environmental Impact Statement  
for the Navy's Proposed Undersea Warfare Training Range on the East Coast;  
CEQ Number 20090213

Dear Ms. Leonard:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (EIS)/Overseas EIS in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The U.S. Department of the Navy (Navy) proposes to place undersea cables and transducer nodes in a 1,713-square-kilometer (km<sup>2</sup>) area of the ocean to create an undersea warfare training range (USWTR) for use as part of anti-submarine warfare (ASW) training. The proposed action would require logistical support for ASW training, including the handling (launch and recovery) of exercise torpedoes (non-explosive) and submarine target simulators.

A number of candidate locations were screened for potential selection as a preferred USWTR site. The site selection process evaluated operational and climatological factors, including air station proximity, climatological compatibility, and shore landing site and infrastructure. In addition to the no action alternative, four site alternatives were evaluated in the Final EIS within the existing Jacksonville, Charleston, Cherry Point, and Virginia Capes military operating areas. A fifth site within the Gulf of Maine was eliminated from further consideration due to unsatisfactory climatological conditions. The Jacksonville site, off the coast of northeastern Florida, was identified as the preferred alternative.


EPA's primary concerns raised in the review of the Draft EIS were related to the deposition of expended training materials and their accumulation over time. This was identified in the Draft EIS as the greatest impact of Navy training activities. EPA raised concerns about the direct and cumulative long-term impacts to the aquatic environment associated with accumulation of these expended materials in this area as part of the proposed action. EPA requested additional monitoring commitments to address these concerns. EPA also raised other endangered species concerns.

EPA appreciates the responses to our comments in the Final EIS. However, EPA continues to have concerns about the long-term ecological impacts of the accumulation of military expended material to benthic substrate, essential fish habitat and the adjacent North Florida Marine Protected Area. In Volume II (Appendix H) as a response to our comments, there is a brief mention of the newly implemented Water Range Sustainability Environmental Program Assessment (RSEPA) Policy. However, there is no discussion of this policy in Volume I of the Final EIS or how it will be applied or implemented in the context of this project. This policy was signed in August 2008 by the Chief of Naval Operations to ensure the long-term viability of operational ranges while protecting human health and the environment. For years, the Navy has instituted an RSEPA program designed to accomplish the same objectives but focused on upland training and testing ranges. The new Water RSEPA policy focuses on the impact of training materials expended in the marine environment. The policy suggests that protective measures will be considered and implemented to sustain range operations, maintain environmental compliance, and address risks associated with munitions constituents and military expended materials.

EPA supports the Navy in initiation of this new range program assessment tool, particularly in light of the significant increase of range training activities at several locations along the east and west coasts of the United States and Gulf of Mexico. However, the Final EIS includes no specific commitments to actually monitor the impacts of these releases into the aquatic environment at the Jacksonville range. Based on the level of concern from various agencies and interest groups, EPA strongly recommends that the Navy include specific commitments to conduct marine-based monitoring in the Record of Decision (ROD) for the project. The ROD should commit to develop a written operational range assessment plan that details the process and procedures to assess the ongoing impacts of this operational range. EPA views this commitment as an opportunity to conduct important impact assessment monitoring and utilize adaptive management to adjust training activities in the future depending on the outcome.

We appreciate the opportunity to review the proposed action. Please contact Ben West of my staff at (404) 562-9643 if you have any questions or want to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz Mueller", with a stylized flourish at the end.

Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Policy and Management